

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF INDIANA, HAMMOND DIVISION**

Caitlin V. Neal,

Plaintiff,

v.

Operators of the Digital Properties Set Forth in
Exhibit 1,

Defendants.

Case No: 2:24-cv-00263-GSL-AZ

Dist. Judge Gretchen S. Lund

Mag. Judge Abizer Zanzi

**PLAINTIFF’S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY RESTRAINING
ORDER, INCLUDING A TEMPORARY ASSET RESTRAINT, AND EXPEDITED
DISCOVERY**

NOW COMES Plaintiff Caitlin V. Neal (“Plaintiff”), by and through Plaintiff’s undersigned counsel, and hereby requests (1) entry of an *ex parte* temporary restraining order, including an injunction against Defendants to enjoin the unauthorized use of protectable aspects of Plaintiff’s personality and identity for purposes of advertising and promoting the sale and distribution of Defendants’ products, (2) imposition of a temporary asset restraint to ensure availability of equitable relief, and (3) expedited discovery in an action arising out of 15 U.S.C. § 1125(a) and related Indiana law. A Memorandum of Law in Support and incorporated declarations of the Plaintiff and Plaintiff’s counsel are filed concurrently with this Motion.

Dated: November 8, 2024

Respectfully submitted,

/s/ Ilya G. Zlatkin
Zlatkin Cann Entertainment
4245 N. Knox Ave.
Chicago, IL 60641
ilya@zce.law
Ph. (312) 809-8022

Counsel for Plaintiff Caitlin V. Neal